

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	CHAPTER 13
Shanyel M. Little	:	
Marcus A. Little	:	No. 21-10824-MDC
Debtor	:	

MOTION TO DETERMINE VALUATION OF SECURED
DEBT OF CREDITOR WELLS FARGO BANK, N.A.

Debtors by their attorney Brad J. Sadek, makes the following Motion to Determine Valuation of Secured Debt held by Wells Fargo Bank, N.A. and in support hereof states the following:

1. Debtors filed the above Chapter 13 Petition for Relief on March 20, 2021.
2. The Debtor financed a 2008 Buick Lacrosse from Wells Fargo Bank, N.A. on June 29, 2016.
3. The value of Debtor's 2008 Buick Lacrosse at time of filing of this case was approximately \$3,400.00. See Exhibit "A".
4. Creditor, Wells Fargo Bank, N.A. filed secured Proof of Claim on April 22, 2021 (Claim No. 5-1) in the amount of \$4,121.85. The Proof of Claim states the vehicle's current value is \$5,175.00. See Exhibit "B."
5. The debtor's vehicle was purchased well over 910 days prior to the date of filing and can be considered for a "cram down" at the vehicle's current value of \$3,400.00 under 11 USC § 506(A)(2).

WHEREFORE, Debtor, by Attorney Brad J. Sadek, respectfully requests this Honorable Court enter an Order to Determining the Valuation of the Secured Debt at \$3,400.00 at 6% and for such further relief as necessary.

/s/ Brad J. Sadek
Attorney for Debtor
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Dated: 6/15/21